

Presentment Date and Time: October 18, 2022 at 12:00 p.m. (Eastern)
Objection Deadline: October 14, 2022 at 5:00 p.m.. (Eastern)

Jonathan L. Flaxer, Esq.
711 Third Avenue
New York, New York 10017
(212) 907-7300

Chapter 11 Trustee for the Estate of Joseph Klaynberg

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
JOSEPH KLAYNBERG,	:	Case No. 22-10165 (MG)
	:	
Debtor.	:	
	:	
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NOTICE OF PRESENTMENT OF APPLICATION OF THE TRUSTEE FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. § 327(A) OF THE BANKRUPTCY CODE AND FED. R. BANKR. P. 2014(A) AND 2016 AUTHORIZING THE RETENTION OF GOLENBOCK EISEMAN ASSOR BELL & PESKOE LLP AS COUNSEL FOR THE CHAPTER 11 TRUSTEE NUNC PRO TUNC TO SEPTEMBER 20, 2022

PLEASE TAKE NOTICE that, Jonathan L. Flaxer, the chapter 11 trustee (the “**Trustee**”) for the estate of the above-captioned debtor (the “**Debtor**”), will present the proposed Order, annexed to the Application as **Exhibit B**, pursuant to § 327(a) of chapter 11 of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”) and Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), authorizing the retention of Golenbock Eiseman Assor Bell & Peskoe LLP (“**GEABP**” or the “**Firm**”) as counsel to the Trustee *nunc pro tunc* to September 20, 2022, for signature to the Honorable Martin Glenn, Chief United States Bankruptcy Judge of the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **October 18, 2022 at 12:00 noon (prevailing Eastern Time)** in accordance with Local Bankruptcy Rule 9074-1(b).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Order must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefor, and must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers of the Honorable Martin Glenn), and any objection must further be served upon: (i) Golenbock Eiseman Assor Bell & Peskoe LLP, Proposed Counsel for the Debtor, 711 Third Avenue, 17th Floor, New York, New York 10017 (Attn: Michael S. Weinstein, Esq.); (ii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014; and (iii) all other parties entitled to service in the above-captioned cases, so as to be received no later than **October 14, 2022 at 5:00 p.m. (prevailing Eastern Time)**. **Unless objections are received by that time, there will not be a hearing, and the proposed Order may be signed.**

Dated: New York, New York
September 30, 2022

Respectfully submitted,

By: /s/ Jonathan L. Flaxer
Jonathan L. Flaxer
711 Third Avenue
New York, New York 10017
(212) 907-7300

Chapter 11 Trustee for the Estate of Joseph Klaynberg